



Tri-Party Agreement

**Inter-Agency Management Integration Team (IAMIT)
Meeting Minutes
November 15, 2018**

Approval: *A.K. Smith*
A.K. Smith
Ecology IAMIT Representative

Date: 12/14/18

Approval: *W.F. Hamel*
W.F. Hamel
DOE-RL IAMIT Representative

Date: 12/10/2018

Approval: *Not in Attendance*
R.G. Hastings
DOE-ORP IAMIT Representative

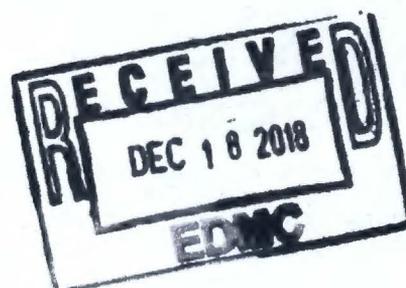
Date: N/A

Approval: *Craig Cameron*
C. Cameron (for D.R. Einan)
EPA IAMIT Representative

Date: 12/18/18

Minutes Prepared by: *Michael Turner*
M.J. Turner
Mission Support Alliance

Date: 12/3/18



M-037-10
C-026-07

Inter-Agency Management Integration Team (IAMIT)
Meeting Minutes
November 15, 2018

**1) Topic: Review IAMIT Action Tracking Table
(See Handout)**

Table I. Actions Items

A) Decision to Delete TPA Commitment C-026-07 for the Annual Tritium Treatment

Technology Development Letter – MSA stated that there were two IAMIT determinations to sign today. The first IAMIT determination is the decision to delete TPA commitment C-026-07 for the annual Tritium Treatment Technology Development letter. Ecology inquired about the genesis of the commitment, and noted that the milestone does not mention a commitment. MSA responded that when the milestone was originally established, there was language in the change control form that stated a yearly letter would be provided, not as a TPA milestone but as a commitment, and the letter has been tracked as a commitment. MSA added that the decision was made to remove the commitment as an IAMIT determination instead of through a change control form since there would be no change in the TPA. MSA noted that the commitment remains in place to provide the five-year Tritium Treatment Technology Development letter.

Ecology stated that it had no objection to the IAMIT determination. Ecology suggested aligning the five-year Tritium Treatment Technology Development report with the CERCLA five-year Record of Decision review, which would require a milestone change to the due date from 2019 to 2022. Ecology asked if the parties were willing to consider the suggestion. DOE-RL responded that it was in agreement with considering Ecology's suggestion. EPA stated that it needed to have an internal follow-up discussion before signing the IAMIT determination. Ecology suggested that more discussion could be held during the meeting scheduled on November 26, 2018, at 3:00. EPA agreed with Ecology's suggestion. MSA stated that this IAMIT determination would be carried over to the next IAMIT meeting. This action remains open.

B) The second IAMIT determination presented for signature today was the project managers' agreement on the use and application of the most recent version of the EPA-approved Pro UCL software. DOE-RL stated that the parties reached agreement on signing the IAMIT determination, but DOE-RL proposed a minor word change yesterday. DOE-RL noted that the language stated that DOE-RL would take action to discuss certain occurrences, and DOE-RL proposed a change from "take action to discuss" to "will discuss." DOE-RL stated that "take action to discuss" could be misinterpreted as sending an invite or a voicemail, and changing the language to "will discuss" clarifies the action for future DOE-RL assistant managers that any of the occurrences will be discussed with the regulators.

DOE-RL stated that Ecology had indicated agreement with the word change. The IAMIT determination was signed by the Tri-Parties.

Table II. Status Updates

A) TPA Five-Year Review – MSA noted that this action was updated to state that there was a 90-day extension to February 15, 2019 for the System Plan 8 negotiations. There was

also an agreement during the October 18, 2018 IAMIT meeting for EPA to take the lead with coordinating the paragraph 148/149 comments. EPA still has the action to follow up with its lawyer's comments. This action remains open.

B) Milestone M-037-10/Closure Actions for Five Specified TSDs, aka "Coordinated Closure" MSA noted that the approach to closure actions for the five TSDs has become a nomenclature of coordinated closure. Ecology stated that a permit project management team meeting is scheduled December 5, 2018, and the approach for coordinated closure is on the agenda for discussion with DOE-RL. Ecology noted that ORP should be included in the discussion. DOE-RL asked if the discussion would be more of a conceptual approach to coordinated closure. Ecology responded that the discussion will be about specific changes to the TPA and specific changes to TPA milestones, and that will change Action Plan Section 5.5 and Section 3.3 in the TPA. Ecology added that the specific milestone changes will not only be for M-037-10, but there will be CERCLA milestones that will have wording changes that will reflect some of the closure plan requirements.

DOE-RL asked if the milestone changes will conflict with the IPL process. Ecology responded that it would not conflict with the IPL process, and it would provide milestone relief for M-037-10, which is currently to be missed. Ecology stated that once the milestone changes have been discussed and agreed to, the schedule for M-037-10 will be moved out and the milestone will no longer be to be missed. This action remains open.

C) Administrative Update to TPA Appendix C to Align with WIDS – MSA noted that this action is associated with the alias changes. Ecology stated that it is in the process of reviewing the change control form, and five minor mistakes have been identified and sent to MSA. Ecology indicated its review should be completed today, and then the parties should be ready to proceed with the change control form. This action remains open.

D) Modifications to TPA Section 9.4, "Administrative Record," to Eliminate Hard Copy Requirements – MSA reported that it is continuing with the upgrade to the Administrative Record. This action remains open.

Table III. Recently Closed/Other Agreements

A) Decision to Include Non-TPA Documentation in the Hanford Administrative Record
An IAMIT determination was approved and signed during the October 18, 2018 IAMIT meeting. This action was closed and will be removed from the action tracking table.

2) Topic: New Action Items

A) There were no new actions identified today.

3) Topic: Other

A) Approve CY 2019 TPA Quarterly and IAMIT Meeting Schedule – MSA distributed the 2019 meeting schedule, which was approved by the Tri-Parties. The meetings will be held at the Ecology office.



**Inter-Agency Management Integration Team Meeting
Thursday, November 15, 2018**

Department of Ecology
3100 Port of Benton Blvd.
Richland, WA

Agenda

1.	Review IAMIT Action Tracking Table
2.	Proposed New Action Items
3.	Other - Approve CY 2019 TPA Quarterly and IAMIT meeting schedule
4.	Adjourn

Inter-Agency Management Integration Team Decision Table/Action Tracking

November 15, 2018

*New information shown in blue

Table I. Action Items

1. Decision to Delete TPA Commitment C-026-07 for the Annual Tritium Treatment Technology Development Letter

Reference: N/A
Affected Milestones: C-026-07
Originated: 11/15/18
Status: Agency Review – IAMIT Determination #2018-009 pending
Dispute Extended: N/A
Action: Parties are being asked to sign IAMIT Determination
Comments: Determination would document the agreement between the Parties to discontinue the commitment to provide the annual tritium treatment technology developments letter to Ecology and EPA, however, the commitment to provide the Five-Year Report remains.

Table II. Status Updates

1. TPA Five-Year Review

Reference: TPA Article XXXVIII
Affected Milestones: N/A
Originated: N/A
Status: Agency Review – closed (via IAMIT Determination)/TPA update – complete
Dispute Extended: N/A
Action: Parties will meet for close-out meeting and commit to meet regularly (or semi-regularly) on remaining agreed-upon sections targeted for updating (*see below).
Comments: Ten TPA Class II Change Control Forms were signed at the August 17, 2017 IAMIT meeting. One Class I Change Control Form was signed at the ECY Director and EPA Regional Administrator level. One Class I Change Control Form was disapproved by EPA.
*Some of the TPA Change Forms initially proposed as part of the TPA update (Paragraphs 148/149, Appendices H and I, and Section 11.8) will not be implemented due to time and available resources. However, the parties have agreed to continue talks on these areas.
Notes: The TPA agencies have determined the changes to the TPA were “not significant” and thereby not subject to public comment. A reprint decision of the TPA has been postponed to late Fall pending changes to the above-mentioned sections of the TPA meeting agreement by the parties. The Parties have committed to continuing talks on other potential changes to the TPA, notably Appendices H, I, Section 11.8 and Paragraphs 148/149.

Pending the outcome of these potential changes, a decision to re-print the TPA will be made. As of December 14, 2017 IAMIT, no change in the status, however it was determined that both Ecology and EPA Legal should be involved in the 148/149 discussions and that potential changes to TPA Appendices H and I may be included in the scope of the “System Plan” negotiations, which resumed January 17, 2018. System Plan Negotiations, originally scheduled to conclude by April 30, 2018, have been extended to November 15, 2018. A 90-

Inter-Agency Management Integration Team Decision Table/Action Tracking

November 15, 2018

day extension to the System Plan 8 negotiations was approved, the new dated for concluding negotiations is February 15, 2019.

At the October 18, 2018 IAMIT meeting, EPA agreed to take the lead in coordinating a Paragraph 148/149 meeting to discuss EPA's legal comments with the Parties for resolution.

Closed:

2. Milestone M-037-10/Closure Actions for Five Specified TSDs, aka "Coordinated Closure"

Reference: TPA Milestone M-37-10: *Complete Unit-Specific Closure Requirements according to the closure plan(s) for six (6) TSD Units: 207-A South Retention Basin, 216-A-29 Ditch, 216-A-36B Crib, 216-A-37-1 Crib, 216-B- 63 Trench, and Hexone Storage and Treatment Facility (276-S-141/142).*

Affected Milestones: M-037-10 (Due 9/30/2020); TPA Action Plan, Sections 3.3, 5.5

Originated: 1/18/18

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to agree that TSD closures will be coordinated with the OUs, then determine best way to adjust the milestone.

Via RCRA Permit Rev. 9 discussions, agencies have agreed that closure of land-based TSDs can

Comments: be coordinated with surrounding OUs. Should Milestone and TPA Sections 3.3 and 5.5 be altered, potential exists for TPA negotiations, tentative agreement and/or public comment.

Closed:

3. Administrative Update to TPA Appendix C to Align with WIDS

Reference: TPA Change Control Form C-18-02

Affected Milestones: N/A

Originated: 10/23/18

Status: Change Control Form C-18-02 has been routed to EPA and Ecology for review

Dispute Extended: N/A

Action: Sign Change Control Form

Comments: Change Control Form in draft, proposes administrative updates to TPA Appendix C, Listing by Operable Unit to update the Waste Unit Aliases only, for consistency to match the aliases within the Waste Information Data System (WIDS).

Closed:

Inter-Agency Management Integration Team Decision Table/Action Tracking

November 15, 2018

4. Modifications to TPA Section 9.4, "Administrative Record," to Eliminate Hard Copy Requirements

Reference: TPA Section 9.4

Affected Milestones: N/A

Originated: 11/15/18 (re-opened)

Status: Change Control Form P-09-18-01 has been drafted, is under review with DOE

Dispute Extended: N/A

Action: Sign Change Control Form

Comments: Change Control Form in draft, proposes eliminating the requirement to maintain hard-copy files in the Hanford Administrative Record. DOE has authorized an Administrative Record system upgrade. This upgrade will enhance search and retrieval capabilities, allow multi-field filtering, provide canned and ad hoc reporting functionality, enable electronic document submittal, and improve system response time. The system upgrade is planned to be completed during the second quarter of fiscal year 2019.

Closed:

Table III. Recently Closed/Other Agreements

1. Decision to Include Non-TPA Documentation in the Hanford Administrative Record

Reference: N/A

Affected Milestones: N/A

Originated: 09/20/18

Status: Agency Review – IAMIT Determination #2018-008

Dispute Extended: N/A

Action: Parties are being asked to sign IAMIT Determination

Comments: Parties will brief the IAMIT 9/20/18 on a pending IAMIT Determination that would allow non-TPA documentation in the TPA Administrative Record. The rationale being that the Hanford Site does not have another public facing electronic records database accessible to the public. As a result of those discussions DOE, Ecology, and EPA have agreed to allow Ecology to upload non-TPA documents into the AR/PIR database for stakeholder/public convenience due to the sometimes intersecting themes with TPA scope.

Closed: 10/18/18 - IAMIT Determination #2018-008 was approved

Calendar Year 2019 Hanford Federal Facility Agreement and Consent Order
(Tri-Party Agreement)
Milestone Review and Inter-Agency Management Integration Team (IAMIT)
Meeting Schedule

The following CY 2019 Tri-Party Agreement meeting schedule has been approved by the U.S. DOE, the U.S. EPA, and Ecology IAMIT representatives. DOE-RL and DOE-ORP TPA Milestone Review Meetings are routinely conducted on the same day at Ecology. Months that there are no Milestone Review Meetings and there are agenda items that need to be addressed, an IAMIT will be scheduled.

DATE	MILESTONES	PROJECT AREA	CHAIRPERSON
January 17, 2019 (Thursday)	IAMIT only if agenda items	IAMIT	Bill Hamel
February 21, 2019 (Thursday)	M-42, 45, 47, 62, 90, Consent Decree	ORP	Rob Hastings
March 21, 2019 (Thursday)	M-15, 16, 24, 26, 35, 36, 37, 83, 85, 89, 91, 92, 93	CP/RC	Alex Smith
April 18, 2019 (Thursday)	IAMIT only if agenda items	IAMIT	Dave Einan
May 16, 2019 (Thursday)	M-42, 45, 47, 62, 90, Consent Decree	ORP	Rob Hastings
June 20, 2019 (Thursday)	M-15, 16, 24, 26, 35, 36, 37, 83, 85, 89, 91, 92, 93	CP/RC	Bill Hamel
July 18, 2019 (Thursday)	IAMIT only if agenda items	IAMIT	Dave Einan
August 15, 2019 (Thursday)	M-42, 45, 47, 62, 90, Consent Decree	ORP	Alex Smith
September 19, 2019 (Thursday)	M-15, 16, 24, 26, 35, 36, 37, 83, 85, 89, 91, 92, 93	CP/RC	Bill Hamel
October 17, 2019 (Thursday)	IAMIT only if agenda items	IAMIT	Rob Hastings
November 21, 2019 (Thursday)	M-42, 45, 47, 62, 90, Consent Decree	ORP	Alex Smith
December 19, 2019 (Thursday)	M-15, 16, 24, 26, 35, 36, 37, 83, 85, 89, 91, 92, 93	CP/RC	Dave Einan

